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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA, ) No. 23-cr-000336 JD  
13 Plaintiff, )  
14 v. ) **STIPULATION TO CONTINUE STATUS  
CONFERENCE AND EXCLUDE TIME FROM  
NOVEMBER 13, 2023, TO JANUARY 8, 2024;  
[PROPOSED] ORDER**  
15 KARI RUSSO AND STEVEN DUNSMORE, ) Current Date: December 18, 2023  
16 Defendants. ) Proposed New Date: January 8, 2024  
17 )

Plaintiff UNITED STATES OF AMERICA and Defendant STEVEN DUNSMORE hereby stipulate as follows:

1. The Court recently continued the status conference in this matter from November 13, 2023, to December 18, 2023, to accommodate its trial schedule;
  2. Counsel for the government is unavailable on this date;
  3. Accordingly, the parties stipulate to continue the status conference to January 8, 2024, at 10:30 a.m., subject to the Court's availability.
  4. With respect to the Speedy Trial Act, it is hereby stipulated by and between counsel for the United States and counsel for the defendant STEVEN DUNSMORE, that time be excluded under the Speedy Trial Act from November 13, 2023, through January 8, 2024, for the

**STIPULATION TO CONTINUE STATUS CONFERENCE; [PROPOSED] ORDER  
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1 effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further  
2 stipulate and agree that the ends of justice are served by excluding the time from November  
3 13, 2023, through January 8, 2024, from computation under the Speedy Trial Act outweigh  
4 the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A),  
5 (B)(iv).

6 The undersigned Assistant United States Attorney certifies that she has obtained approval from  
7 counsel for the Defendant to file this stipulation and proposed order.

8  
9 IT IS SO STIPULATED.

10 DATED: November 9, 2023

11 \_\_\_\_\_/s/  
WENDY M. GARBERS  
Assistant United States Attorney

12 DATED: November 9, 2023

13 \_\_\_\_\_/s/  
JOHN JORDAN  
Counsel for Defendant STEVEN DUNSMORE

1 [PROPOSED] ORDER  
2

3 Based upon the facts set forth in the stipulation of the parties and for good cause shown, the  
4 December 18, 2023 status conference is continued to January 8, 2024, at 10:30 a.m. Additionally, the  
5 Court finds that failing to exclude the time from November 13, 2023, through January 8, 2024, would  
6 unreasonably deny the parties the reasonable time necessary for effective preparation, taking into  
7 account continuity of counsel and the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The  
8 Court further finds that the ends of justice served by excluding the time from November 13, 2023,  
9 through January 8, 2024, from computation under the Speedy Trial Act outweigh the best interests of the  
10 public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS  
11 HEREBY ORDERED that the time from November 13, 2023, through January 8, 2024, shall be  
12 excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

13 IT IS SO ORDERED.

14  
15 DATED: November 14, 2023



16 JAMES DONATO  
United States District Judge